

# Exhibit A

United States District Court for the Eastern District of New York

*Fischer, et al. v. Government Employees Insurance Company d/b/a GEICO*

Case No. 23 Civ. 2848 (SJB) (SLT)

# Collective Action Notice

*Authorized by the U.S. District Court*

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Do you or did you work for GEICO at any time since October 23, 2020 as a Special Investigator in New York?

There is a collective action lawsuit and you may be eligible to participate.

If you want to participate in the collective action, you need to opt in by [60 days from mailing of notice].

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Important things to know:

- This is a lawsuit about whether GEICO owes Special Investigators compensation for overtime hours worked during the timeframe noted above. There has been no decision in the case yet.
- Unless you complete and return the Consent to Join form included in this Notice, you will not be able to participate in the lawsuit or share in any monetary recovery obtained in this case, if any.

## Table of Contents

<b>Why did I get this notice?</b> .....	3
<b>What is the deadline to opt in?</b> .....	3
<b>Who is in the collective?</b> .....	3
<b>Do I have a lawyer in this lawsuit?</b> .....	3
Learning About the Lawsuit.....	4
<b>What is this lawsuit about?</b> .....	4
Deciding What To Do .....	4
<b>What are my options?</b> .....	4
Opting In .....	4
<b>How do I opt in?</b> .....	4
<b>What happens if I join the lawsuit?</b> .....	5
<b>If I join, will there be any impact on my employment?</b> .....	5
Doing Nothing and Exclusion from the Case.....	5
<b>What happens if I do nothing?</b> .....	5
Key Resources.....	6
<b>How do I get more information?</b> .....	6

# About This Notice

## Why did I get this notice?

This notice is to tell you about a collective action lawsuit, *Fischer et al. v. GEICO*, brought on behalf of certain people who live or lived in New York and work or have worked as Special Investigators for GEICO. **You received this notice because you may be a member of the group of people, called the “collective,” who are eligible and can choose to join the case.** This notice gives you information about the case and tells you how to opt in if you want to be part of it.

Read this notice to understand the case and to determine if you are a collective member. Then, decide if you want to participate in the case. If you have questions or need assistance, please email Plaintiffs’ counsel at [GEICO-SIU@outtengolden.com](mailto:GEICO-SIU@outtengolden.com) or call [phone number].

## What is the deadline to opt in?

The deadline to join the case is [60 days from mailing of notice].

## Who is in the collective?

This is the definition of the collective that the court approved:

Special Investigators<sup>1</sup> who lived in New York state and were employed as a Special Investigator in New York state from October 23, 2020 to the present, and who elect to opt in to this action.

## Do I have a lawyer in this lawsuit?

If you choose to join the lawsuit, you will be represented by Plaintiffs’ counsel, Outten & Golden LLP. Information about Plaintiffs’ counsel is available at: [www.outtengolden.com](http://www.outtengolden.com).

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<sup>1</sup> The Special Investigators job title includes, among others, Level 65 Special Investigators, Level 66 Special Investigators, Special Investigator Trainers, SIU Investigators, Security Investigators, Senior Outside Security Investigators, Outside Field Investigators, Medical Investigators, Medical Fraud Investigators, Inside Medical Investigators, and Lead Investigators.

**Your Lawyers:** Michael Scimone, Sabine Jean, Ryan Cowdin, and Jarron McAllister of Outten & Golden, LLP; and Troy Kessler and Garrett Kaske of Kessler Matura P.C.

These are the lawyers who are bringing this case. **You will not be charged for their services**, although their fees may be paid with the court's approval from any settlement or other monetary recovery that they obtain for the collective.

## Learning About the Lawsuit

### What is this lawsuit about?

Plaintiffs filed a lawsuit in 2023, known as *Fischer et al. v. GEICO*, No. 23-cv-2848-SJB-SLT, claiming that GEICO did not pay its Special Investigators overtime wages owed to them and violated federal overtime law and New York wage-and-hour laws.

GEICO denies that it did anything wrong and maintains that it paid its Special Investigators properly for all hours worked.

The Court, Judge Sanket J. Bulsara of the Eastern District of New York, has not yet decided who is correct.

## Deciding What To Do

### What are my options?

You have two options. You can opt in to participate in the case and, if successful, share in any monetary recovery obtained or do nothing and choose not to participate in the case.

## Opting In

### How do I opt in?

To opt into the case, you must complete the "Consent to Join" form included with this Notice **no later than [60 days from mailing of notice]**.

You can email the form to [case administrator email address] or mail the form to the administrator postmarked by [date]:

[Case Administrator]  
[Street Address]  
[City, State, Zip Code]  
[Phone Number]

## What happens if I join the lawsuit?

You will be bound by any ruling, settlement, or judgment, whether favorable or unfavorable. If there is a favorable resolution, either by settlement or judgment, and you qualify under the law, you may be entitled to some portion of the recovery.

If you join this lawsuit, you may be asked to provide documents, give testimony, and provide information about your work for GEICO to help the Court decide whether you are owed any money. Plaintiffs' counsel will assist you with this process.

For this reason, if you join this lawsuit, you should preserve all documents relating to your employment currently in your possession.

## If I join, will there be any impact on my employment?

The law prohibits GEICO from discharging or retaliating against you because you join this case or have in any other way exercised your rights under the law. If you believe you have been retaliated against because of this lawsuit, you should seek legal advice.

# Doing Nothing and Exclusion from the Case

## What happens if I do nothing?

If you do nothing, you will not be able to participate in the case and you will not be able to participate in any recovery, if there is one.

This means that you give up the possibility of getting money or

benefits in this overtime lawsuit that may come from a trial or settlement, if those bringing the lawsuit are successful.

## Key Resources

### How do I get more information?

This notice summarizes the certification decision. There are more details in the case documents. To get a copy of the case documents or get answers to your questions:

- contact the lawyers who represent the members of the collective who choose to participate (information below)
- access the Court Electronic Records (PACER) system online or by visiting the Clerk's office of the Court (address below).

Resource	Case Information
<b>Toll Free Number</b>	[phone number]
<b>Case Administrator</b>	[Case Administrator] [Street Address] [City, State, Zip Code] [Phone Number]
<b>Plaintiffs' Lawyers</b>	Michael J. Scimone Sabine Jean Ryan Cowdin Jarron D. McAllister <b>OUTTEN &amp; GOLDEN LLP</b> 685 Third Avenue, 25th Floor New York, NY 10017 Tel.: (212) 245-1000 Email: GEICO-SIU@outtengolden.com  Troy L. Kessler Garrett Kaske 534 Broadhollow Road, Suite 275 Melville, New York 11747 Tel.: (212) 245-1000 Email: GEICO-SIU@outtengolden.com

<b>Court (DO NOT CONTACT)</b>	U.S. District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201
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